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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ABBEY DENTAL CENTER, INC., a Nevada
Corporation,

Plaintiff,

vs.

CONSUMER OPINION LLC, a Nevada
Limited liability company; DOES 1-10; and
ROE ENTITIES 1-10, inclusive,

Defendant(s).

Case No. 2:15-cv-02069-GMN-PAL

STIPULATION AND (PROPOSED)
ORDER TO STAY PROCEEDINGS
(3rd Request)

Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION
LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as
follows:

1. The aforesaid parties are currently actively engaged in settlement negotiations in
regards to the instant matter.
2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter

1 for thirty (30) days, in order to allow the parties to facilitate settlement.

2 3. The Court entered the parties' stipulation as an Order on January 14, 2016.

3 4. The Court's Order was due to expire on February 5, 2016.

4 5. Due to continuing settlement discussion, the parties stipulated to stay the matter
5 for a second time on February 3, 2016.

6 6. The Court entered the parties' second stipulation as an Order on February
7 9, 2016.

8 7. Productive settlement discussions are still ongoing, and accordingly, in an effort
9 to facilitate those efforts, as well as to minimize attorneys' fees and other legal expenses, the
10 parties believe that the present civil action should be stayed for an additional thirty (30) days.

11 8. Therefore, the parties agree that the Court may enter the following Order and
12 request that the Court do so accordingly:

13 a. Except as otherwise provided below, this action shall be stayed for a
14 period of thirty (30) days from the date this stipulation is filed with the Court.

15 b. The stay shall immediately terminate upon Plaintiff's filing with the
16 Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's
17 complaint in this action or otherwise respond to same in accordance with the *Federal Rules of*
18 *Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

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21 //

c. The parties stipulate that nothing in this delay shall be deemed to prejudice Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

SO STIPULATED AND AGREED on this 3rd day of March, 2016.

THE AMIN LAW GROUP, NV., LTD.

RANDAZZA LEGAL GROUP, PLLC

/s/ Ismail Amin, Esq.

/s/ Marc J. Randazza, Esq.

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Attorney for Plaintiff

Attorney for Defendant

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

Dated:_____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd of March, 2016, I served a true and correct copy of:
STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS (3rd Request),
postage fully prepaid and addressed to the following:

_____ serving the following parties via US Mail, postage prepaid;

 X serving the following parties via CM/ECF;

_____ serving the following parties via facsimile;

_____ serving the following parties via Overnight Express;

Marc J. Randazza, Esq.
3625 South Town Center Drive
Las Vegas, NV 89135
Attorney for Defendant

 /s/ Teresa Armendariz
Teresa Armendariz
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